

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KURT HUCKABEE,)	
individually and on behalf of all)	Case No. 2:11-cv-7657
others similarly situated,)	
)	
Plaintiff,)	CLASS ACTION
)	
v.)	
)	Filed Electronically
SOVEREIGN BANK,)	
)	
Defendant.)	

**PLAINTIFF’S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff, Kurt Huckabee, by and through his undersigned counsel, respectfully moves this Court for an Order preliminarily approving the terms of a proposed class action settlement; approving the form and method of providing notice of the settlement to the class; and scheduling a final hearing regarding the settlement. In support of this Motion, the Plaintiff avers as follows:

1. After arms-length negotiations, the Parties have reached a proposed settlement of this putative class action. On or about August 1, 2012, the Parties executed a Class Action Settlement Agreement (“Settlement Agreement” or “Settlement”), a copy of which is attached hereto as Exhibit 1.

2. Consistent with the Memorandum of Law filed herewith, the Plaintiff respectfully requests that the Court sign the proposed Order preliminarily approving the terms of a proposed class action settlement; approving the form and method of providing notice of the settlement to the class; and scheduling a final hearing regarding the settlement.

3. Plaintiff’s counsel has conferred with Defendant’s counsel with respect to this Motion and Defendant does not oppose the Motion.

WHEREFORE, the Plaintiff hereby moves this Court for an Order (1) preliminarily approving the terms of the Settlement as set forth in the Settlement Agreement; (2) approving the form of notice and the method of providing notice of the Settlement to the Class as set forth in the Settlement Agreement, and directing that said form of notice be provided to Class Members in that manner; and (3) scheduling a Final Settlement Hearing at which the request for final approval of the proposed Settlement, Plaintiffs' Counsels' application for an award of attorneys' fees and costs, and for the entry of the Final Judgment and Order will be considered. A proposed Order Preliminarily Approving the Class Settlement, Directing the Issuance of Notice to the Class and Scheduling a Settlement Hearing is attached to the Settlement Agreement as Exhibit "A."

Respectfully Submitted,

/s/ Bruce Carlson
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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record via the Court's electronic filing system on this 6th day of August, 2012.

/s/ R. Bruce Carlson
R. Bruce Carlson